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United States
Environmental Protection
AgencyRegion 10
Hanford Project Office
712 Swift Boulevard, Suite 5
Richland WA 99352

9201730



January 10, 1992



Wilbert A. Kalk
1934 Meadows Drive North
Richland, Washington 99352

Subject: Comment Response on the "Expedited Response Action
Proposal for 200 West Area Carbon Tetrachloride Plume"

Dear Mr. Kalk:

Thank you for spending the time to review and comment on the proposal for expedited cleanup of carbon tetrachloride contamination in Hanford's 200 West Area. Your comments appear to address three major concerns. These concerns are:

- long-term reliability of soil vapor extraction,
- potential for contamination of vapor extraction equipment with radioactive substances, and
- the duration of the carbon tetrachloride cleanup project.

Soil vapor extraction has been used at a wide variety of Superfund sites to recover volatile chlorinated solvents, like carbon tetrachloride from contaminated soil. The conditions at Hanford appear ideally suited for its application and, therefore, we expect this system to be fairly reliable, but it also appears that the duration of the carbon tetrachloride cleanup project may be quite long. If the estimates of carbon tetrachloride inventory are accurate (in excess of 1000 metric tons), then this will likely be a long and potentially costly process.

Your concern over the potential for radioactive contamination of the vapor extraction equipment is a valid one. The actual field procedures for monitoring the potential for buildup of radioactivity on process equipment were not included in the Expedited Response Action (ERA) proposal. Several other activities are planned to evaluate these concerns including routine monitoring of the HEPA particulate filter system and sampling and analysis of the recovered carbon tetrachloride liquids to evaluate the potential for radioactive contamination.

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Wilbert A. Kalk

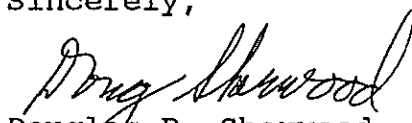
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January 10, 1992

Finally, the duration of the action described in this proposal is currently planned for a minimum of two years. This period will not likely be sufficient to complete the cleanup of carbon tetrachloride from the 200 West Area soils, but this action should help to stabilize the existing carbon tetrachloride plume and provide much of the data necessary to develop a final remedy.

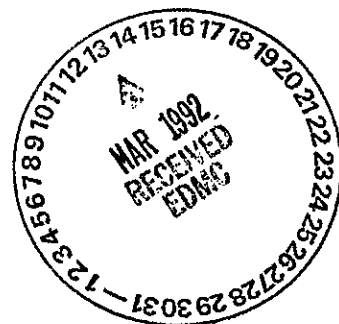
Once again, thank you for your time and interest in the Hanford cleanup process.

Sincerely,



Douglas R. Sherwood
Environmental Engineer

cc: Administration Record (200 Area Carbon Tetrachloride)



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WILBERT A. KALK
1934 Meadows Drive North
Richland, WA 99352

December 4, 1991

Paul Day
U.S. Environmental Protective Agency
712 Swift Blvd. Suite 5
Richland WA 99352

Subject: Comments on the 200 West Area Carbon Tetrachloride Plume
Expedited Response Action Plan

My comments are centered on my concern for the long term reliability of the Vapor Extraction System and how the reliability affects the time to complete the response action.

1. The report presented data for two well runs (23 and 80 hours in duration). Although the alpha activity measured ($7.2E-07$ uCi/m and ND) in the particulate filters is low, long term operation of the VES could result in relatively high activity within the equipment.

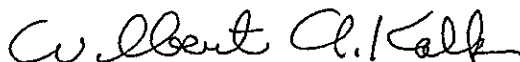
2 Even if the level of radioactivity in the extraction stream is low, radioactive materials can plate out in the quiescent flow points in the equipment and over a period of time a load of radioactivity can build up to the point that the activity becomes a hazard to personnel.

3. If this does occur, movement of the system from one location to another maybe difficult and like wise hands on maintenance may not be possible.

4 Assuming there will be contamination of the equipment in the loop, how will these components or the whole system be maintained and what special precautions for the safety of the operators, maintenance personnel and test technicians will be required.

5 Although plans for relocating the VES are to be determined in the next phase of the response action, and thus the duration of the project, estimates of the total project length would be desirable in determining, not only when the project would be complete but also how much contaminated equipment might be generated and what would be the risk if any to the public.

Yours truly



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Richland WA 99352

Hanford Project Office

DEC 6 1991

Environmental
Protection Agency

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Author: D. R. Sherwood, EPA Addressee: W. A. Kaik Correspondence No.: Incoming 9201730

Subject: COMMENT RESPONSE ON THE "EXPEDITED RESPONSE ACTION PROPOSAL FOR 200 WEST AREA CARBON TETRACHLORIDE PLUME"

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